IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

INEOS FLUOR AMERICAS LLC,	)))	
Plaintiff,	))	
v.	))	**C.A. No. 06-189 (SLR)**
HONEYWELL INTERNATIONAL INC.,	))	
Defendant.	)))	

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant Honeywell International, Inc. will take the deposition upon oral examination of ***Kim Wall***, INEOS Fluor Americas LLC, beginning at 9:00 a.m. on April 26, 2007, at the offices of Breazeale, Sachse & Wilson, LLP, One American Place, 301 Main Street, Baton Rouge, LA 70825.

The oral examination will be recorded by stenographic and videographic means, will take place before a notary public or other person authorized by law to administer oaths, and will continue from day to day until completed.

You are invited to attend and examine the witness.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

_____

Martin P. Tully (#465)
Jason A. Cincilla (#4232)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
  *Attorneys for Defendant Honeywell
  International Inc.*

OF COUNSEL:

KIRKLAND & ELLIS LLP
Yosef J. Riemer
Andrew R. Dunlap
Michael D. Reisman
153 East 53rd Street
New York, NY 10022
(212) 446-4800

-and-

Mark L. Kovner
Michael S. Becker
Julie Brennan Jacobs
655 Fifteenth Street, NW
Suite 1200
Washington, DC 20005-5793
(202) 879-5000

Dated: April 16, 2007

CERTIFICATE OF SERVICE

I, Jason A. Cincilla, hereby certify that on April 16, 2007, my co-counsel caused

copies of the foregoing document to be served upon the following counsel of record as indicated:

By Federal Express and E-mail

Richard S. Order   [rso@avhlaw.com]
Mark D. Alexander   [mda@avhlaw.com]
Axinn, Veltrop & Harkrider LLP
90 State House Square
Hartford, CT 06103
(860) 275-8100

C. Barr Flinn   [bflinn@ycst.com]
Karen L. Pascale   [kpascale@ycst.com]
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
(302) 571-6600

                                                    /s/ Jason A. Cincilla
                                                    Jason A. Cincilla (#4232)

801221.1